

Ryan Lucksinger, Chapter 7 Trustee  
PO BOX 1257, Rocklin, CA 95677  
(916) 580-3366

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
Sacramento Division

In Re,

MOTIVATED TRANSPORTATION

DYNAMICS, INC

,Debtor(s)

} **Case No.** 09-42361- B -7

} **DCN:** FRL - 01

} **DATE:** June 1, 2010

} **TIME:** 9:32 a.m.

} **DEPT:** C, Courtroom 35, Sixth Floor

**MOTION FOR SALE OF ASSETS AND DECLARATION OF RYAN  
LUCKSINGER**

I, RYAN LUCKSINGER, the duly appointed trustee in the above entitled  
matter, hereby move for an order authorizing the sale of assets of the estate.

1. The Debtor(s) herein filed Chapter 7 bankruptcy on 10/14/09. I have been  
appointed Trustee for the estate.

2. During the review of the financial affairs of the corporation, the Trustee  
determined that the bankruptcy estate has an equitable interest in certain vehicles and  
trailers which were not exempted on Schedule C. The Trustee has reviewed the pink  
slips for each of the respective items and noted that no perfected security interests  
against the vehicles and trailers. The assets are as follows:

Body type					
Year	Make	/ Model	License	Mileage	VIN
1993	Isuzu Box Truck	VN FTR	5R77247	135435	JALK7AU12P3200283
1999	Peterbilt Truck	DS 379	9B39460	827305	1XP5DR9X0XD487491
2000	Peterbilt Truck	DS 378	9B70131	631501	1NP5GGGG20D553571
2001	International Truck	VN BT	6K05202	306466	1HTSCAAM81H371081
2002	International Truck	DS	9D00700	350429	2HSCBAXR62C034531
2000	Trailmobile Trailer	53FT	2QHA865	N/A	1PT01JAH1Y9013256
2000	Trailmobile Trailer	53FT	2QHA864	N/A	1PT01JAH7Y9013262
1999	Wabash Trailer	53FT	4CG4315	N/A	1JJV532W8XL523969
1999	Wabash Trailer	53FT	4CG4316	N/A	1JJV532W4XL523970

3. The Trustee has received an offer from Mike Dilkey who resides at 1290 Arrow Court, Auburn, CA 95602-9303 ("Buyer") to purchase the equitable interest in the vehicles and trailers for \$25,000, subject to any and all liens that may be in existence. The Buyer shall be responsible for any and all sales tax and transfer fees, if any. The Buyer has already paid the balance of \$25,000 to the Trustee.

4. The Trustee has consulted with an auctioneer service and determined that the offer of \$25,000 is of comparable net estimated value that an auction of the vehicles and trailers would bring at an auction. As such the Trustee has accepted this offer subject to the approval of the United States Bankruptcy Court and subject to overbid.

5. Overbidding is recommended in increments of \$1,000 with overbids starting at a value of \$26,000 or higher. Any bidders shall provide the Trustee a bank cashier's check of \$26,000 prior to bidding, with any balance in excess due and to be paid no later than 5 p.m. of June 1, 2010 by certified funds at the office address of 2140 Professional Drive, Suite 240, Roseville, CA 95661.

1 6. The Trustee requests authority to sell the Estates equitable interest in the  
2 vehicles and trailers for \$25,000 to Mike Dilkey, subject to any and all liens that may  
3 be in existence.  
4

5 For the reasons above, I pray for an order as follows:  
6

- 7 1. The Court approve to sale the equitable interest, subject to any and all liens  
8 that may be in existence, in the vehicles and trailers for \$25,000 to Mike  
9 Dilkey (“Buyer”) or over-bidder at a higher value.;  
10  
11 2. This Court authorizes the Trustee to provide a Bill of Sale and exercise any  
12 other documents to transfer the vehicles and trailers to the buyer; and  
13  
14 3. For such other and further relief as the Court deems appropriate.  
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16 DATE: April 30, 2010

/s/ Ryan Lucksinger  
Ryan Lucksinger, Chapter 7 Trustee

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21 **DECLARATION OF RYAN LUCKSINGER**  
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23 I, Ryan Lucksinger, hereby declare under penalty of perjury:

- 24 1. I am the Trustee in this case.  
25  
26 2. I have reviewed all of the foregoing and it is true and correct and if called I  
27 would so testify.

28 DATE: April 30, 2010

/s/ Ryan Lucksinger  
Ryan Lucksinger, Chapter 7 Trustee  
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